

THIS MOTION SEEKS TO REJECT CERTAIN CONTRACTS AND LEASES. PARTIES RECEIVING THE MOTION WHOSE CONTRACTS OR LEASES ARE SUBJECT TO REJECTION SHOULD LOCATE THEIR NAMES ON EXHIBIT "A" TO THE PROPOSED FORM OF ORDER.

GIBBONS P.C.

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,
et al.,

Debtors.¹

Chapter 11

Case No. 19-12809 (JKS)

(Jointly Administered)

**Objection Deadline: June 11, 2019, 4:00pm ET
Hearing Date: June 18, 2019, 10:00am ET**

**AMENDED NOTICE OF DEBTORS' OMNIBUS MOTION FOR ENTRY OF
AN ORDER (I) AUTHORIZING REJECTION OF CERTAIN EXECUTORY
CONTRACTS AND UNEXPIRED LEASES (II) ESTABLISHING A CLAIMS BAR
DATE, AS APPLICABLE, AND (III) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

TO: (I) OFFICE OF THE UNITED STATES TRUSTEE FOR REGION THREE; (II) COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (III) COUNSEL TO PREPETITION SECURED LENDERS; (IV) ALL PARTIES WHO HAVE FORMALLY REQUESTED NOTICES IN THIS CASE PURSUANT TO FED. R. BANK. P. 2002; AND (V) ALL PARTIES LISTED ON EXHIBIT A TO THE PROPOSED ORDER

PLEASE TAKE NOTICE that New England Motor Freight, Inc. and its affiliated debtors in the above-captioned Chapter 11 cases, as debtors and debtors-in-possession (the “Debtors”) by and through undersigned counsel, have filed the *Debtors’ Omnibus Motion for Entry of an Order (I) Authorizing Rejection of Certain Executory Contracts and Unexpired Leases (II) Establishing a Claims Bar Date, as Applicable, and (III) Granting Related Relief* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that objections to the Motion must be filed with the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102 on or before **June 11, 2019 at 4:00 p.m.** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that court appearances will be required to prosecute any such objections. Any objections or responses to the Motion should also be served so as to be received by the following on or before the Objection Deadline:

- (i) *Counsel for Debtors:* Gibbons P.C., One Gateway Center, Newark, NJ 07102-5310, Attn: Karen A. Giannelli, Esq., Mark B. Conlan, Esq., Brett S. Theisen, kgiannelli@gibbonslaw.com, mconlan@gibbonslaw.com, btheisen@gibbonslaw.com;
- (ii) *U.S. Trustee:* Office of the United States Trustee, One Newark Center, 1085 Raymond Blvd., Suite 2100, Newark, NJ, Attn: Mitchell B. Hausman and Peter J. D’Auria, Mitchell.B.Hausman@usdoj.gov, Peter.J.D’Auria@usdoj.gov; and
- (iii) *Counsel for the Official Committee of Unsecured Creditors:* Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, NJ 07068, Attn: Joseph J. DiPasquale and Mary E. Seymour, jdipasquale@lowenstein.com, mseymour@lowenstein.com and Elliott Greenleaf, 1105 N Market St, 17th Fl, Wilmington, DE 19801-1216, Attn: Rafael X. Zahralddin and Jonathan M. Stemerman, rxza@elliottgreenleaf.com, jms@elliottgreenleaf.com.

PLEASE TAKE FURTHER NOTICE that if any objections are filed to the Motion, a hearing will be held on the Motion on **June 18, 2019 at 10:00 a.m. E.T.** before the Honorable John K. Sherwood, United States Bankruptcy Judge, in Courtroom 3D at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

May 24, 2019
Newark, New Jersey

GIBBONS P.C.

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